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Nevada Bar No. 9017

2 **HKM EMPLOYMENT ATTORNEYS LLP**

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Attorney for Plaintiff

6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 CATHERINE FLEMING, An Individual) CASE NO. **2:17-cv-03049-JAD-CWH**

9)
10 Plaintiff,)

11 vs.)

12 CIGNA HEALTHCARE, DOES I-X;)
13 ROE CORPORATIONS I-X.)

14 Defendants.)
15)

16 **STIPULATION AND ORDER TO EXTEND THE TIME TO RESPOND TO**
17 **DEFENDANT'S PARTIAL MOTION TO DISMISS**
18 **(SECOND REQUEST)**

19 COMES NOW, the Plaintiff, CATHERINE FLEMING ("Fleming"), by and through
20 her attorney, JENNY L. FOLEY, Ph.D., ESQ., of the law firm HKM EMPLOYMENT
21 ATTORNEYS LLP, and Defendant, CIGNA HEALTHCARE ("CIGNA"), by and through its
22 attorneys, WENDY MEDURA KRINCEK, ESQ., and KAITLYN M. BURKE, ESQ., of
23 LITTLER MENDELSON, P.C., hereby stipulate and agree as follows:

24 1. That the Opposition to the Defendant's Partial Motion to Dismiss due on
25 February 22nd, 2018, may be due on March 1st, 2018.

26 2. That the Reply to the Opposition to the Defendant's Partial Motion to Dismiss
27 remains due on March 8th, 2018.
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3. The hearing shall remain scheduled for March 12, 2018.

4. This extension of time is made in good faith and not for purposed of delay.
Plaintiff's counsel has had a death in the family.

5. This is the second request for an extension of time in this matter.

Dated this 23rd day of February, 2018. Dated this 23rd day of February, 2018

HKM Employment Attorneys LLP **Littler Mendelson, P.C.**

<u>/s/ Jenny L. Foley</u>	<u>/s/ Kaitlyn M. Burke</u>
Jenny L. Foley, Ph.D., Esq.	Wendy Medura Krincek, Esq.
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IT IS SO ORDERED that the Opposition to the Defendant's Partial Motion to Dismiss shall be due on March 1st, 2018;

IT IS SO ORDERED that the hearing on this matter shall remain scheduled for March 12th, 2018.

Respectfully submitted by:
HKM Employment Attorneys LLP

Respectfully submitted by:
HKM Employment Attorneys LLP

/s/ Jenny L. Foley
 Jenny L. Foley, Ph.D., Esq.
 Nevada Bar No. 9017
 1785 East Sahara Ave, Suite 325
 Las Vegas, Nevada 89104
Attorney for Plaintiff